



CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY



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LINDA S. ADAMS
SECRETARY FOR
ENVIRONMENTAL PROTECTION

ARNOLD SCHWARZENEGGER
GOVERNOR

Certified Mail: 7003 1680 0000 6173 6415

June 26, 2008

Mr. Curtis Batson, Director
San Luis Obispo County Environmental Health
2156 Sierra Way
San Luis Obispo, California 93406

Dear Mr. Batson:

The California Environmental Protection Agency (Cal/EPA), Department of Toxic Substances Control, and the State Water Resources Control Board conducted a program evaluation of the San Luis Obispo County Environmental Health Certified Unified Program Agency (CUPA) on Tuesday, May 13, 2008 and Wednesday, May 14, 2008. The evaluation was comprised of an in-office program review, and field oversight inspections, by State evaluators. The evaluators completed a Certified Unified Program Agency Evaluation Summary of Findings with your agency's program management staff. The Summary of Findings includes identified deficiencies, a list of preliminary corrective actions, program observations, program recommendations, and examples of outstanding program implementation.

The enclosed Evaluation Summary of Findings is now considered final and based upon review, I find that San Luis Obispo County Environmental Health's program performance is satisfactory with some improvement needed. To complete the evaluation process, please submit Deficiency Status Reports to Cal/EPA that depict your agency's progress towards correcting the identified deficiencies. Please submit your Deficiency Status Reports to Kareem Taylor every 90 days after the evaluation date. The first deficiency progress report is due on August 12, 2008.

Cal/EPA also noted during this evaluation that San Luis Obispo County Environmental Health has worked to bring about a number of local program innovations, including the use of a UST inspection checklist which provides a comprehensive list violations, corrective actions required, and timeframes for completion of correction actions. We will be sharing these innovations with the larger CUPA community through the Cal/EPA Unified Program web site to help foster a sharing of such ideas statewide.

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Thank you for your continued commitment to the protection of public health and the environment through the implementation of your local Unified Program. If you have any questions or need further assistance, you may contact your evaluation team leader or Jim Bohon, Manager, Cal/EPA Unified Program at (916) 327-5097 or by email at jbohon@calepa.ca.gov.

Sincerely,

[Original Signed by Don Johnson]

Don Johnson
Assistant Secretary
California Environmental Protection Agency

Enclosure

cc/Sent via email:

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CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

Enclosure



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CERTIFIED UNIFIED PROGRAM AGENCY EVALUATION SUMMARY OF FINDINGS

CUPA: San Luis Obispo County Environmental Health Services

Evaluation Date: May 13 - 14, 2008

EVALUATION TEAM

Cal/EPA: Kareem Taylor

SWRCB: Terry Snyder

DTSC: Mark Pear

This Evaluation Summary of Findings includes the deficiencies identified during the evaluation, program observations and recommendations, and examples of outstanding program implementation activities. The evaluation findings are preliminary and subject to change upon review by state agency and CUPA management. Questions or comments can be directed to Kareem Taylor at (916) 327-9557.

	<u>Deficiency</u>	<u>Preliminary Corrective Action</u>
1	<p>The CUPA has not completed a narrative self audit that adequately summarizes the effectiveness of its permitting, inspection, enforcement, and single fee system activities for fiscal years (FYs) 04/05 through 06/07. The CUPA did utilize a self audit checklist for FY 06/07 to fulfill the self audit requirement for the CUPA and its PA; however, no self audits were completed for FYs 04/05 and 05/06.</p> <p>Note: The self audit guidance questionnaire is only meant as a tool for completing the self audit process and is in no way meant to be a substitute for the narrative self audit requirement.</p> <p>CCR, Title 27, Section 15280 (Cal/EPA)</p>	<p>By September 30, 2008, the CUPA will complete a FY 07/08 self audit that includes a narrative that summarizes the effectiveness of its activities. The CUPA will complete a self audit by September 30 of each year.</p> <p>Submit the CUPA's FY 07/08 self audit to Cal/EPA.</p>
2	<p>The CUPA is not forwarding hazardous materials inventory data to emergency response agencies within 15 days of receipt and confirmation. CUPA management stated that inventory data is submitted to emergency response agencies on a quarterly basis.</p> <p>HSC, Chapter 6.95, Section 25509.2 (a)(3) (Cal/EPA)</p>	<p>By July 14, 2009, the CUPA will submit hazardous materials inventory data to emergency response agencies within 15 days of receipt and confirmation.</p>
3	<p>The CUPA does not have the following Unified Program (UP) administrative procedures:</p>	<p>By August 14, 2008, the CUPA will complete its administrative procedures.</p>

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	<ul style="list-style-type: none"> • Public participation procedures • Procedures for responding to requests for information from government agencies with a legal right to access the information. • Procedures for forwarding the HMRRP information in accordance with Health and Safety Code sections 25503.5(d) and 25509.2(a)(3). <p><i>The CUPA's current procedures do not specify that HMRRP inventory information should be forwarded to emergency response agencies within 15 days of receipt and confirmation.</i></p> <ul style="list-style-type: none"> • Financial management procedures • Procedures for the withdrawal or removal of a PA <p>CCR, Title 27, Section 15180 (e) (Cal/EPA)</p>	<p>The CUPA will submit a copy to Cal/EPA with its first progress report.</p>
4	<p>The CUPA's Annual Summary Reports for FYs 04/05 through 06/07 contains incomplete or incorrect information. After a discussion with CUPA management, the following errors were discovered:</p> <ul style="list-style-type: none"> • In the Annual Single Fee Summary Report (Report 2), the total amount of single fee waived (for CUPA and PA) and surcharge waived was reported incorrectly. Also, the total number of regulated businesses and UST facilities was reported incorrectly. • In the Annual Inspection Summary Report (Report 3), the number of regulated businesses reported for the UST program was incorrect. • In the Annual Enforcement Summary Report (Report 4), the number of facilities with violations was reported incorrectly for all UP elements. <p>CCR, Title 27, Section 15290 (a) (Cal/EPA)</p>	<p>By August 14, 2008, the CUPA will submit the Annual Summary Reports for FY 06/07 that contains all of the correct information.</p> <p>The CUPA will submit a copy to Cal/EPA with its first progress report.</p>
5	<p>The CUPA's Inspection and Enforcement (I and E) plan does not include all of the required elements.</p> <ul style="list-style-type: none"> • Coordination of inspection efforts between the CUPA and its participating agencies. 	<p>By November 14, 2008, the CUPA will complete its I and E plan that include all the required elements. In addition, ensure that the I and E plan is complete and meets all of the legal requirements. Please refer to the new I and E plan</p>

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	<ul style="list-style-type: none"> • Identification of all available enforcement options. <i>The CUPA uses Red Tag as an enforcement option, but it is not included in the I and E plan.</i> • Identification of penalties and enforcement actions that are consistent and predictable for similar violations and no less stringent than state statute and regulations. <i>The current enforcement policy language suggests that formal enforcement may not be initiated for all Class I violations. This policy is in contrast with the state enforcement policy which requires all Class I violations to be addressed through formal enforcement.</i> <i>Also, the CUPA's I and E plan allows any violation, including minor, up to 60 days for correction. The law states that a person who receives a notice to comply detailing a minor violation shall not have more than 30 days from the date of the notice to comply in which to correct any violation cited in the notice to comply.</i> • Provisions for multi-media enforcement. <i>While this element was not included in the I and E plan, the CUPA has been participating in multi-media enforcement for approximately 10 years through their involvement with the San Luis Obispo Environmental Enforcement Group (SLOEEG). SLOEEG is coordinated by Deputy DA Steve von Dohlen.</i> • A description of how the CUPA minimizes or eliminates duplication, inconsistencies, and lack of coordination within the inspection and enforcement program. <p>CCR, Title 27, Section 15200 (Cal/EPA) HSC, Chapter 6.11, Section 25404.1.2 (c) (1) State Enforcement Policy</p>	<p>guidance that can be found on the Cal/EPA web site.</p> <p>The CUPA will submit a copy to Cal/EPA with its first progress report.</p>
6	<p>The CUPA is not conducting inspections with a frequency consistent with its I and E plan. Specifically, the CUPA is not meeting its scheduled annual inspection frequency for its business plan, CalARP and hazardous waste generator (HWG) programs. Unforeseen staffing</p>	<p>By December 14, 2008, the CUPA will hire addition staff to assist in meeting its scheduled inspection frequencies.</p> <p>By February 14, 2010, CUPA will</p>

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	<p>developments have been the cause of the decrease in inspections. The CUPA is meeting the legally mandated inspection frequency for all program elements.</p> <p>Upon review of the files, the following businesses were found not to have been inspected within the triennial cycle:</p> <ul style="list-style-type: none"> • Atascadero Transmission Service was last inspected on May 04, 2004. • Templeton Steel Fabricators was last inspected on September 27, 2004. <p>Note: A schedule of inspection frequencies for all program elements should be included in the I and E plan. CUPA management stated that all UP element facilities are on an annual inspection frequency schedule.</p> <p>CCR, Title 27, Section 15200 (a) (3) (Cal/EPA) and (DTSC)</p>	<p>inspect all program element facilities annually.</p>
7	<p>The CUPA is unable to consistently document that facilities that have received a notice to comply citing minor violations have returned to compliance within 30 days of notification. Either the business must submit a Return to Compliance Certification in order to document its compliance or in the absence of certification the CUPA must follow-up with the business to confirm that compliance has been achieved. For example, no Return to Compliance Certifications or follow-up actions could be found in the files for the following facilities documenting that all violations had been corrected:</p> <ul style="list-style-type: none"> • 02/23/2007 inspection conducted at Fender's Auto Service at 9090 El Camino Real in Atascadero, CA • 03/10/2006 inspection conducted at San Luis Tallow Company located at 445 Prado Road in San Luis Obispo CA • 09/06/2007 inspection conducted at California Polytechnic State in San Luis Obispo, CA. <p>CCR, Title 27, Section 15200 (a) HSC, Chapter 6.5, Section 25187.8 (DTSC)</p>	<p>The CUPA will ensure that all facilities with minor violations return to compliance by documenting this in the file by either a return to compliance certificate or other follow-up documentation.</p> <p>By September 1, 2008, please describe what procedural changes will be made by the CUPA to continuously improve return to compliance rates.</p>
8	<p>The CUPA failed, in certain instances, to take enforcement in a manner consistent with state law.</p> <p>Examples of specific cases are:</p>	<p>The CUPA will initiate and complete the appropriate formal enforcement for all Class I violations. For cases referred to the DA that are not being pursued, the</p>

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<p>1) In the latest 04-24-2008 San Luis Obispo Progress Report, the CUPA stated that a worker at El Camino Gas asked the CUPA inspector if it was permissible to recycle his used oil at a neighboring shop. The CUPA inspector notified the business owner that this was not permissible and he must have the used oil picked up by a licensed hazardous waste transporter at the facility. Using an unlicensed hazardous waste transporter is a Class I violation. The CUPA inspector explained that the owner is new to the business and complied with the CUPA inspector's direction. The CUPA is required to take formal enforcement against all facilities with Class I violations, regardless of whether or not the facility has come back into compliance.</p> <p>2) During an August 22, 2002 inspection of Pacific Ag Group, the CUPA cited the facility for the following violations:</p> <ul style="list-style-type: none"> • failure to operate and maintain the facility to prevent and minimize the release of hazardous waste to the environment, • failure to make hazardous waste determinations for wastes stored and disposed on site, • failure to transport and dispose of hazardous wastes to a facility permitted through the State Department of Toxic Substances Control, • failure to ship hazardous wastes under manifest, • failure to properly label drums and containers of hazardous wastes, • failure to maintain containers containing hazardous waste in good condition to minimize release or reaction, and • failure to store hazardous wastes in closed and sealed containers. <p>Following the county's investigation, a work plan was prepared, and the buried pesticide containers and immediately surrounding soil were removed by hand excavation and placed in two 55-gallon drums. Additional soil was excavated by backhoe adjacent to and below the location of the containers with approximately 13 cubic yards of soil placed in roll-off bins. Excavated containers and contents were inventoried. The excavated soil and containers were later disposed at a Class I disposal facility.</p> <p>No administrative enforcement order had been issued</p>	<p>CUPA will exercise another formal enforcement option.</p> <p>.</p> <p>By November 14, 2008, the CUPA will add a process in its I and E plan for implementing formal enforcement administratively when other formal enforcement options have been initiated, but not continued to completion.</p> <p>On the first progress report, submit an action plan to Cal/EPA for how the CUPA will ensure that all inspectors are trained in violation classification and evidence gathering techniques (for building successful enforcement cases).</p>
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	<p>after the DA, US EPA, and the AG all declined to take the case.</p> <p>3) During the December 15, 2005, January 05, 2006, and March 06, 2006 inspections of Water World Resorts Inc., the CUPA cited the facility for the following violations:</p> <ul style="list-style-type: none"> • disconnecting a UST monitor, • failure to notify authorities of a release of hazardous material, • supervising or performing work on a UST system without ICC certification, • failure to obtain a permit to modify the UST system, • working at a hazardous waste site without required training, • failure to perform a hazardous determination, • transporting hazardous waste without a license, and • disposing of hazardous waste to an unauthorized point. <p>No administrative enforcement order had been issued after the DA declined to take the case.</p> <p>All Class I violations must be addressed through a formal enforcement action.</p> <p>State Enforcement Response Policy (EO-02-003-PP). (DTSC) CCR, Title 27, Section 15200 HSC, Sections 25110.8.5 and 25117.6, and CCR, Title 22, Section 66260.10 HSC, Section 25299 (a)(9) (SWRCB) HSC, Section 25299 (f)(2) HSC, Section 25295 CCR, Title 23, Section 2715</p>	
9	<p>The CUPA did not provide a summary of violations/notice to comply on 02/23/2007 during the conclusion of the inspection of Fender's Auto Service, but the CUPA instead mailed the inspection report to the facility.</p> <p>HSC, Sections 25185 (c) (1) and 25187.8 (a) (DTSC)</p>	<p>Please instruct staff by August 1, 2008, that a Summary of Violations must always be left on site at the conclusion of an inspection.</p>
10	<p>The CUPA renewed an underground storage tank (UST) permit when the UST had been inspected by the local agency within the previous 12 months and the inspection verified that the UST did not comply with all applicable provisions and existing permit conditions. Specifically one facility, Port San Luis Harbor District, was red</p>	<p>By August 14, 2008, the CUPA will submit an action plan to Cal/EPA on how it will ensure that permits will not be issued to facilities out of compliance with regulations and permit conditions. The plan should include the follow-up</p>

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	<p>tagged on June 26, 2007 for a significant violation and was later closed with fuel removed from the tanks according to the CUPA. They were issued a permit renewal on January 1, 2008. Pismo Food Store was non-compliant for a minor violation during their 2007 inspection yet was issued a renewal permit on January 1, 2008. This facility was reinspected in March 2008 as having returned to compliance.</p> <p>CCR, Title 23, Section 2712 (e) (SWRCB)</p>	<p>inspection process used to verify that all violations have been corrected before the permit is renewed.</p>
11	<p>The CUPA's permit does not include all the required UST specific elements. It is missing monitoring requirements of both tanks and piping or an attached approved monitoring plan (new Form D). The permit needs to specify if the tank annular space and the piping are VPH or has an Annular sensor, not just ATG. Also the permit should specify that the dispensers and sumps will have sensors.</p> <p>CCR, Title 23, Section 2634 (b), 2641 (g) and 2712 (c) (SWRCB)</p>	<p>By January 1, 2009, the CUPA will issue permits that either include all of the monitoring requirements or includes an approved Monitoring Plan (new Form D).</p>
12	<p>The CUPA's UST facility files reviewed did not contain monitoring or response plans or they were not current.</p> <p>The facility files reviewed were Port San Luis Harbor District, Pismo Food Store, and Nipomo Market Place.</p> <p>CCR, Title 23, Section 2632 (d), 2711 (a) (SWRCB)</p>	<p>The CUPA will request monitoring and response plans to be submitted during the annual inspections from the UST owner/operators as necessary.</p> <p>By May 15, 2009 all UST facility files will contain approved monitoring and response plans.</p>

CUPA Representative

Aaron LaBarre
(Print Name)

Original signed
(Signature)

Evaluation Team Leader

Kareem Taylor
(Print Name)

Original signed
(Signature)

Certified Unified Program Agency (CUPA)
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Certified Unified Program Agency (CUPA)
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PROGRAM OBSERVATIONS AND RECOMMENDATIONS

The observations and recommendations provided in this section address activities the CUPA are implementing and/or may include areas for continuous improvement not specifically required of the CUPA by regulation or statute.

1. **Observation:** The local fees fund approximately 40% of the costs to implement San Luis Obispo's UP. The remaining 60% comes from the General Fund.

Recommendation: Cal/EPA suggests that the CUPA consider revising its fees so that local business fees cover a larger percentage of the UP costs to provide long term stability.

2. **Observation:** The CUPA's uses an Envision database to store inspection and enforcement information in addition to its hardcopy files. The enforcement information in the database is not always up-to-date with the hardcopy files. The CUPA has recognized the issue and is working to correct the problem.

Recommendation: Cal/EPA recommends that the CUPA continue to update the enforcement information in the Envision database.

3. **Observation:** The Annual Summary Reports 3 and 4, the Unified Program Consolidated Forms, and the UST forms have all changed in the Title 27 regulations. Cal/EPA observed that the CUPA's Envision database stores and calculates summary report information based on the old summary report format.

Recommendation: Cal/EPA recommends that the CUPA review the new forms and their instructions on Cal/EPA's web site. The CUPA may want to modify its Envision database to store and calculate summary report information in the new format for FY 07/08 and beyond.

4. **Observation:** As of January 05, 2007, agency records shows that Mr. Froylan Majeno has made no effort to comply with the proposed decision of Samuel D. Reyes, Administrative Law Judge. Mr. Majeno has not performed any of the site remediation work described, has not met any of the deadlines, has not paid any of the penalties imposed in the final order for \$368,550 and has not filed any petition for writ of mandate or any other appeal. The order is final and outstanding.

Recommendation: The CUPA should discuss its internal options for pursuing uncollected penalties. In the Hazardous Waste Program, one option for collecting penalties is to use HSC 25184.2 to convert the Final Order to a civil judgment. Other options include small claims court, internal and external collection agencies, liens, permit revocations, and/or referral to a prosecutorial agency.

5. **Observation:** The HWG inspection reports lack a developed description of a facility's operation and/or manufacturing processes occurring on site.

Recommendation: The inspector should develop the observation section of the report in order to fully describe the facility's operations occurring on site so that anyone who may read the report may gain an understanding of the products made, services provided, and what industrial/manufacturing processes are occurring.

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- 6. Observation:** Inspector neglected to take pictures of violations noted during the HWG oversight inspection.

Recommendations: Photographs serve as an excellent record to document the state of a facility's condition. Specific information is required when penalties need to be assessed. An inspector should always have a camera available to him at all times in order to document his detailed observations reflecting the exact field conditions.

- 7. Observation:** In the two of the four files reviewed, the Financial Responsibility letter was missing and in the other two the letter was outdated. This requirement is specified in CCR Title 23 Section 2711 (a) (11) and HSC Chapter 6.7 Section 25292.2.

Recommendation: The SWRCB encourages the CUPA to verify Financial Responsibility documentation before and during the annual inspections and if missing or outdated, get the owner/operator to submit current statements to bring UST facility files and facility paperwork into compliance.

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EXAMPLES OF OUTSTANDING PROGRAM IMPLEMENTATION

1. The CUPA continues to have an active formal enforcement program. Examples include:
 - A settled administrative order with Mesa View Market for \$29,820 in penalties. Respondent failed to conduct a hazardous waste determination.
 - A settled administrative order with California Fine Wire Co. for \$930,450 in penalties. Respondent released hazardous waste to the environment, and failed to provide secondary containment for containers or drums containing hazardous waste.
 - A settled administrative order with Miller's 76 for \$66,240 in penalties and \$6,000 in administrative costs. Respondent among other violations disposed of hazardous waste into on-site clarifier.
 - A settled administrative order with Chevron USA for \$62,000 in penalties and \$2,000 in administrative costs. Respondent failed to maintain continuous monitoring system, allowed leak detection to be disabled, and failed to provide positive turbine shutdown, and raised leak detection sensors in under dispenser containment.
 - A referred criminal enforcement case to the San Luis Obispo DA's Office against a garage shop (enforcement confidential) for the illegal transportation of a hazardous waste, illegal disposal of a hazardous waste, and failure to clean up a hazardous waste discharge. The DA has not yet filed charges.
 - A referred criminal enforcement case to the San Luis Obispo DA's Office against an auto body shop for the illegal disposal and storage of a hazardous waste (enforcement confidential). The DA has not yet filed charges.

During the June 24, 2005 inspection of Gibbs Truck Center, the CUPA cited the facility for illegal hazardous waste discharge due to a malfunctioning clarifier. The CUPA meticulously followed through with the allegation of possible illegal disposal, until a site investigation by Levine-Fricke determined otherwise. Their report addressed both the immediate area in the vicinity of the clarifier, and the leach field down gradient from the clarifier. No petroleum hydrocarbons in the gas, diesel, or motor oil ranges were detected in the twenty one soil samples analyzed; no BTEX compounds or MTBE were detected. The facility did pay a total bill of \$18,000.

2. The CUPA has an excellent UST inspection checklist which provides for listing violations, corrective actions required, and timeframes within which to complete these. These checklists provide firm foundation for developing enforcement actions. Specifically, there were two AEOs taken from UST inspections with significant violations noted on these checklists.
3. The CUPA's UST inspector conducted the facility inspection in a thorough and professional manner. The inspector's attention to detail and knowledge of code and regulations resulted in an excellent inspection. During the inspection, most of the overfill buckets had liquid in them which the inspector had the service technician remove and properly dispose of before the monitoring certification was over. Also the inspector advised the facility owner to inform his Designated Operator and delivery contractors that they must be more diligent in properly replacing the lids on the overfill buckets to minimize liquid intrusion

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into the overfills. Although the owner corrected the facility's spill bucket violations onsite, the inspector still cited these conditions as minor violations in his inspection report and was aware that the violations were not SOC violations. The inspector asked the SWRCB evaluator for suggestions on how to improve his inspection technique and procedure. Additionally, the inspector performed a Business Plan inspection along with the UST inspection.